

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Investigation on the Commission's Own Motion
Regarding Innovative Utility Ratemaking
Approaches that Promote Conservation and
Efficiency Programs by Removing Disincentives
that May Exist Under Current Ratemaking Policies

Docket 05-UI-114

**MOTION OF WISCONSIN PUBLIC SERVICE CORPORATION
TO INTERVENE**

Wisconsin Public Service Corporation ("WPSC") hereby moves pursuant to Wis. Stat. § 227.44 and Wis. Admin. Code § PSC 2.21(1) to intervene in this matter. WPSC's undersigned attorneys also hereby file a Notice of Appearance. In support of its motion, WPSC states the following:

1. WPSC is a public utility organized under the laws of the State of Wisconsin with its principal office located at 700 North Adams Street, Green Bay, Wisconsin. WPSC is an integrated electric and natural gas public utility that serves over 433,000 electric customers in north central and northeastern Wisconsin and Michigan's Upper Peninsula, and over 314,000 natural gas customers in north central and northeastern Wisconsin.
2. The Notice of Investigation in this matter states that the investigation will "consider innovative utility ratemaking approaches"
3. This docket may result in decisions that, among other things, affect how WPSC's rates are determined and how WPSC recovers its costs from its customers; and
4. As a public utility, WPSC has a substantial interest in this matter that cannot be adequately represented by any other party.

WPSC requests that the undersigned be included on the service list for this proceeding, and that the following person also be included on the courtesy copy list:

Dennis M. Derricks
Director – Electric Regulatory Policy & Analysis
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For these reasons, WPSC requests that its motion to intervene be granted and that it be made a party to this proceeding.

Dated this 22nd day of May, 2008.

Respectfully submitted,

/s/ Bradley D. Jackson
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